

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

KIMBERLY BOTTOMS, on behalf of herself
and all others similarly situated,

Plaintiff,

v.

BLOCK, INC. (F/K/A, SQUARE, INC.)
(D/B/A, CASH APP),

Defendant.

NO. 2:23-cv-01969-MJP

**STIPULATED MOTION AND
[PROPOSED] ORDER TO EXTEND
DEADLINE TO FILE PLAINTIFF'S
PRELIMINARY APPROVAL MOTION**

NOTED FOR CONSIDERATION:
JUNE 23, 2025

I. STIPULATION

Plaintiff Kimberly Bottoms and Defendant Block, Inc. ("Parties") respectfully request that the Court extend the deadline for Plaintiff to file her motion for preliminary approval to June 30, 2025. The current deadline is June 23, 2025.

1. On April 11, 2025, the Parties notified the Court that they had reached an agreement in principle to resolve this action on a class-wide basis as a result of a mediation session held on March 18, 2025. ECF No. 81.

2. The Parties requested the Court stay the case, including consideration of Defendant's Motion for Summary Judgment on Plaintiff's Individual Claims (ECF No. 40), while the Parties worked to formalize the terms of the settlement. ECF No. 81.

3. On April 18, 2025, the Court stayed the case "for 60 days or until such time as Plaintiff files her motion for preliminary approval of class settlement, whichever comes earlier." ECF No. 82.

4. On June 16, 2025, the Parties requested an additional week—to June 23, 2025—to complete necessary tasks related to the settlement agreement and preliminary approval motion, reporting that they have been working diligently to finalize the terms of the agreement, retain a settlement administrator, and draft the preliminary approval motion and supporting documents. ECF No. 87.

5. The Court granted the Parties' request. *See* ECF No. 88.

6. Over the course of the last several days, the Parties have continued their efforts to finalize the settlement agreement, retain a settlement administrator, and finalize the preliminary approval papers. Despite their diligence, the Parties need an additional week to complete these tasks.

7. For these reasons, good cause exists to extend the deadline for Plaintiff's motion for preliminary approval by one week to June 30, 2025 to allow the Parties to retain a settlement administrator and finalize and execute the settlement agreement.

RESPECTFULLY STIPULATED TO AND DATED this 25th day of June, 2025.

TERRELL MARSHALL LAW GROUP PLLC DAVIS WRIGHT TREMAINE LLP

By: /s/ Jennifer Rust Murray

Beth E. Terrell, WSBA #26759
Email: bterrell@terrellmarshall.com
Jennifer Rust Murray, WSBA #36983
Email: jmurray@terrellmarshall.com
Eden B. Nordby, WSBA #58654
Email: enordby@terrellmarshall.com
936 North 34th Street, Suite 300
Seattle, Washington 98103
Telephone: (206) 816-6603

Sophia M. Rios, *Admitted Pro Hac Vice*
Email: srios@bm.net
BERGER MONTAGUE PC
8241 La Mesa Blvd., Suite A
La Mesa, California 91942
Telephone: (619) 489-0300

E. Michelle Drake, *Admitted Pro Hac Vice*
Email: emdrake@bm.net
BERGER MONTAGUE PC

By: /s/ Lauren B. Rainwater

Kenneth E. Payson, WSBA #26369
Email: kenpayson@dwt.com
Lauren B. Rainwater, WSBA #43625
Email: laurenrainwater@dwt.com
Theo A. Lesczynski, WSBA #59780
Email: theoleszczynski@dwt.com
920 Fifth Avenue, Suite 3300
Seattle, WA 98104-1610
Telephone: (206) 622-3150
Facsimile: (206) 757-7016

Attorneys for Block, Inc.

1 43 SE Main Street, Suite 505
2 Minneapolis, MN 55414
3 Telephone: (612) 594-5933


4 Colleen Fewer, *Admitted Pro Hac Vice*
5 Email: cfewer@bm.net
6 BERGER MONTAGUE PC
7 505 Montgomery Street, Suite 625
8 San Francisco, California 94111
9 Telephone: (415) 376-2097

10 *Attorneys for Plaintiff*
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

II. ORDER

IT IS SO ORDERED.

DATED this 25th day of June, 2025.



MARSHA J. PECHMAN
UNITED STATES DISTRICT JUDGE